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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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Jesse Ross #1098756

HDP P.O. Box 650

Indian Springs NV, 89070

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JESSE ARON ROSS,
Plaintiff,

CASE NO:

2:17-CV-02386-APG-GWF

-VS-

BRIAN SANDOVAL et al.,
Defendants.

* Request for Leave to
File a Late Reply;

* Plaintiff's Reply to
Defendants opposition; To Plaintiff's motion For court
order Allowing Plaintiff to Possess medical Records

Comes Now above named Plaintiff, appearing Pro-
se to Reply to Defense opposition. This Reply is
based upon the paper and pleadings on file, the Reply
herein, and any oral argument permitted at
the hearing of this matter.

certificate of service Attached.

1 Permitted to have they're "PSI" on the Prison
 2 yard. The defendants oppo. is a ploy with a
 3 self-serving Affidavit to impede Plaintiff's
 4 ability to Litigate. The NDoc is 200 employees
 5 short staffed, to think they would be able to
 6 Alot staff to timely Access, escort, copy, mail
 7 Plaintiff's medical records Attached to pleading
 8 is not reasonable. In Fact they are so short
 9 staffed they've had to Lock the Prison down
 10 53 times (see "SAC" 6-G-4, 5,) and
 11 canceled or delayed yard 78 times (see
 12 "SAC" pages 6-G-1, 2, 3) In the past year.

13
 14 Furthermore The defendants own policy
 15 For sees the need in the course of
 16 Litigation to have A Prisoner-Plaintiff,
 17 Possess the records For Litigation. see
 18 the Defendants own EXHIBIT 1 (in DEF. aff)
 19 AR 639 at AR 639.02 (8) pg 3 & AR 639
 20 .03 (1) at pg 4 & 6, which states the court
 21 may Allow Plaintiff with a court order to possess
 22 his own Records. The Defendant Quote
 23 "Turner -v- Safely. But Turner Also States
 24 "Prison walls do NOT Form a Barrier separating
 25 Prison inmates From the protections of the constitution
 26 (emphasis Added) Turner-v Safely 482 U.S. 78 @
 27 84 (1987)

I. Request for Leave to File Late Reply.

On 4-10-18 Plaintiff received "Defendant
Opposition to Plaintiff's motion for court order
allowing him to possess medical records in his
cell" (Herein After "Def. oppo"). On 4-12-18
Plaintiff was transferred from Level 3 to Level
2 in a mass offender rehoming. On 4-17-18
Plaintiff went to Law Library to get legal
supplies. Due to lack of paper, envelopes and
the big move Plaintiff was not able to
timely reply to Def. oppo, and therefore
Respectfully requests the courts permission
to file this reply late.

II. Plaintiff's Reply.

In the Def. oppo, the defendants state as a
Broad Policy matter, that offenders should not
be permitted to have their medical records.

The Affidavit by the Former Director does not
list one specific incident of a breach
of security. Nor do the defendants list any
information that may compromise Plaintiff. Plaintiff
does not have any of the diseases listed,
And as to those, they are listed in an inmates
Pre-sentence Investigation Report (PSI),
Prepared by the court, and offenders are

1 A Prisoner - Plaintiff Faces an uphill battle in
 2 civil litigation that ordinary litigants dont. At some
 3 point you just give up and Abandon the Process.
 4 Plaintiff is NOT ASKING For Anything a freeworld
 5 Litigant wouldn't Have Access to. Plaintiff has NOT
 6 in 8 years of incarceration had anything stolen
 7 from him. Furthermore Plaintiff Assumes the RISK
 8 and if presented with theft or extortion will timely
 9 report the incident. Finally Should the defendants Feel
 10 A Particular Record record presents A Articulate
 11 Articulate security concern, they may withhold
 12 the same pending A Judicial determination. Plaintiff
 13 only ASKs For medical records The defense submits
 14 As exhibits, and such records that are discoverable
 15 Plaintiff's Ability to diligently Prosecute this Action
 16 Would be Crippled and Substantially chilled were the
 17 Court Not to order the dissemination of discoverable
 18 medical records, and Plaintiff waives Any Liability the
 19 defendant have in disclosing these records to
 20 Plaintiff. The DAG in Exhibit 3 states the Prison warden will
 21 Provide Access to the records upon request, A respected
 22 Jurist (Judge Judy) stated if it doesn't sound right it
 23 Probably isn't. The warden of the Prison to date has not
 24 responded to Plaintiff's request For that record.

25 4-19-18

Respectfully

Jesse Ross

Jesse Ross - pro-se - Plaintiff

CERTIFICATE OF SERVICE

I, Jesse Ross, hereby certify that I am the petitioner in this matter and I am representing myself in propria persona.

On this 19 day of April, 2018, I served copies of the "Request for Leave to File A Late Reply; * Plaintiff's Reply to defendant's opposition; To Plaintiff's motion For --" in case number: 2:17-cv-02386-APG-GWF and placed said motion(s) in U.S. First Class Mail, postage pre-paid:

Address: 555 East Washington Ave Suite 3900, Las Vegas NV. 89101
Sent to: Jared M. Frost v. A.G.O.

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he is/the petitioner in the above-entitled action, and he, the defendant has read the above CERTIFICATE OF SERVICE and that the information contained therein is true and correct. 28 U.S.C. §1746, 18 U.S.C. §1621.

Executed at High Desert State Prison Clark County Nevada on this 19 day of April, 2018.

Jesse Ross
Jesse A. Ross

DOP# 1095756

PETITIONER -- In Proper Person

Jesse Ross #1095756
HDSP P.O. Box 650
Indian Springs NV 89070

Ross v. Sindhu et al. USDC NV
2:17-cv-02386-APG-GWF
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